

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

CLARANCE BARRON, JR. : CIVIL ACTION NO.: 1:14-CV-02754

VERSUS : JUDGE JAMES T. TRIMBLE, JR.

WILLIAM EARL HILTON, IN THEIR : MAG. JUDGE PEREZ-MONTES
OFFICIAL and INDIVIDUAL CAPACITY
AS SHERIFF OF RAPIDES PARISH
SHERIFF'S OFFICE, ET AL.

MEMORANDUM IN SUPPORT OF
MOTION TO COMPEL

NOW INTO COURT, through undersigned counsel, come Defendants, Sheriff William Earl Hilton, in his individual and official capacity as the Rapides Parish Sheriff, Deputy Michael Gill, in his individual and official capacity as a Deputy for Sheriff Hilton, and Deputy Brett Bolin, in his individual and official capacity as a Deputy for Sheriff Hilton, who respectfully submit the following:

I. ARGUMENT

The Federal Rules of Civil Procedure allow for the taking of depositions. (F.R.C.P. Rule 30). The failure to cooperate in discovery can lead to a motion for an order compelling discovery, including the taking of a deposition. (F.R.C.P. Rule 37).

Defendants desire to complete discovery in order to file a Motion for Summary Judgment and to prepare for a trial on the merits. Defendants are merely seeking to compel Barron to cooperate in discovery and to attend his own deposition.

Respectfully submitted:

PROVOSTY, SADLER, deLAUNAY
FIORENZA & SOBEL, APC

By: /s/ H. Bradford Calvit
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ATTORNEYS FOR DEFENDANTS,
SHERIFF WILLIAM EARL HILTON, IN HIS
INDIVIDUAL AND OFFICIAL CAPACITY AS
THE RAPIDES PARISH SHERIFF,
DEPUTY MICHAEL GILL, IN HIS INDIVIDUAL
AND OFFICIAL CAPACITY AS A DEPUTY FOR
SHERIFF HILTON, DEPUTY BRETT BOLIN,
INDIVIDUALLY AND IN HIS OFFICIAL
CAPACITY AS A DEPUTY FOR SHERIFF
HILTON

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of March, 2016, I electronically filed the foregoing pleading with the Clerk of Court by using the CM/ECF system which will send notice of electronic filing to the following:

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I further certify that I forwarded the foregoing document via first-class mail to the following non-CM/ECF participants: None.

/s/ H. Bradford Calvit
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